

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
(COLUMBIA DIVISION)

Thomas, et.al.

\_\_\_\_\_,  
Plaintiffs,

v.

Andino, et.al.

\_\_\_\_\_,  
Defendants.

)  
) Case No. 3:20--cv-01552-JMC  
)  
)  
)  
)  
)  
)  
)  
)  
)

**Motion  
in Support of  
*Pro Hac Vice* Application**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Dale Edwin Ho be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).

- X Prior to filing this Motion, I conferred with opposing counsel who have indicated the following position as to this Motion: ☐ will likely oppose; X They do not intend to oppose.
- ☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):

☐ No duty of consultation is required because the opposing party is proceeding pro se.

\_\_\_\_\_  
Firm Name

\_\_\_\_\_  
P.O. Box 20998

\_\_\_\_\_  
Street Address or Post Office Box

\_\_\_\_\_  
Charleston, SC 29413

\_\_\_\_\_  
City, State, Zip Code

\_\_\_\_\_  
843-282-7953

\_\_\_\_\_  
Telephone Number

\_\_\_\_\_  
sdunn@aclusc.org

\_\_\_\_\_  
E-Mail Address

\_\_\_\_\_  
Susan K. Dunn (Federal Bar #647)

\_\_\_\_\_  
Name of Local Counsel

\_\_\_\_\_  
s/ Susan K. Dunn

\_\_\_\_\_  
Signature of Local Counsel

\_\_\_\_\_  
Local Counsel for the Plaintiffs

revised 09/19/05